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*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO/OAKLAND DIVISION

ALAMEDA COUNTY MALE PRISONERS  
And Former Prisoners, DANIEL GONZALEZ,  
et al. on behalf of themselves and others  
similarly situated, as a Class, and Subclass

**PLAINTIFFS,**

vs.

ALAMEDA COUNTY SHERIFF'S OFFICE,  
et al

**DEFENDANTS.**

No. 3:19-cv-07423 JSC

[Proposed] ORDER RE DISCOVERY  
DISPUTE

Plaintiffs' Statement Regarding Discovery Dispute was reviewed. Defendant Wellpath declined to submit a statement.

WHEREAS, the parties had a meet and confer on September 6, 2023, and counsel for Wellpath agreed that the responses to interrogatories were not sufficient. As a result of the meet and confer, all agreed that defendant Wellpath would do further investigation, by contacting each witness referenced in an interrogatory and produce amended interrogatory responses no later than October 6, 2023. The agreement contemplated that if the witness had no further recollection than the limited

1 notes or comments in a medical record, the parties would craft a stipulation limiting any trial  
2 testimony of said witnesses to the four corners of the medical record notation. For those witnesses  
3 with independent or supplemental recollections of matters beyond what was recorded in a medical  
4 record, defendant Wellpath would provide amended interrogatories.

5 IT IS HEREBY ORDERED that Wellpath shall have up to and until October 6, 2023 to  
6 amend their responses to interrogatories. For those witnesses identified in Wellpath's Initial  
7 Disclosures which defendant Wellpath does not provide amended responses to interrogatories, their  
8 trial testimony shall be limited to the actual language within the four corners of the medical records  
9 that they themselves notated, and be barred from introducing any additional testimony, at the time of  
10 trial.

11 Dated: September \_\_, 2023  
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JUDGE OF THE FEDERAL DISTRICT COURT  
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